

Law Offices of:

**PHILIP J. BERG, ESQUIRE**

555 Andorra Glen Court, Suite 12

Lafayette Hill, PA 19444-2531

Identification No. 09867

(610) 825-3134

Attorney for: Plaintiffs'

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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LISA LIBERI, et al,

Plaintiffs,

vs.

ORLY TAITZ, et al,

Defendants.

Case No.: 09-cv-01898-ECR

*Assigned to Honorable Eduardo C. Robreno*

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**PLAINTIFFS' EMERGENCY REPLY and REQUEST FOR SANCTIONS and  
ATTORNEY FEES to DEFENDANT ORLY TAITZ'S FRIVOLOUS RESPONSE  
TO PLAINTIFFS' MOTION FOR CLARIFICATION or in the  
ALTERNATIVE MOTION TO RECONSIDER PURSUANT TO F.R.C.P. 59(e);**

**NOW COME** Plaintiffs', Lisa Liberi [hereinafter "Liberi"]; Philip J. Berg, Esquire [hereinafter "Berg"], the Law Offices of Philip J. Berg; Evelyn Adams a/k/a Momma E [hereinafter "Adams"]; Lisa Ostella [hereinafter "Ostella"]; and Go Excel Global by and through their undersigned counsel, Philip J. Berg, Esquire, and hereby files Plaintiffs' Reply and Request for Sanctions and Attorney Fees to Defendant Orly Taitz Frivolous Response to Plaintiffs' Motion for Clarification or in the Alternative Reconsideration of the July 13, 2010 Order; Plaintiffs' Request this Court Deny

Defendant Orly Taitz's Request to Purchase the August 7, 2009 Transcript as it was "Sealed" by this Honorable Court; and Plaintiffs' Request to Maintain the August 7, 2009 Transcript "Under Seal". In support hereof, Plaintiffs aver as follows:

- Defendant Orly Taitz's Response is frivolous and filed for an improper purpose. Defendant Taitz failed to cite any proper jurisdictional law or properly address Plaintiffs' Motion to Maintain the August 7, 2009 Transcript Sealed.
- Just as pointed out in Plaintiffs' previous filings, Defendant Orly Taitz is stalking Lisa Liberi; her son; Lisa Ostella; and Lisa Ostella's children.
- Defendant Taitz has threatened to destroy Plaintiff Liberi and get rid of her, which Defendant Taitz in one of her filings with this Court has admitted; Defendant Orly Taitz has also threatened to have Plaintiff Lisa Ostella's children professionally kidnapped; and on June 25, 2009 drove around where Plaintiff Ostella and her family reside and where Plaintiff Ostella's children attend school. *See* Affidavit of Charles Edward Lincoln, III previously filed with this Court.
- Defendant Orly Taitz's has obtained the photographs of the Plaintiffs Lisa Liberi; Lisa Ostella; their husbands and children, by her (Defendant Orly Taitz) own admissions to this Court.
- The picture that Defendant Taitz filed with her July 28, 2010 Response, was only located on Plaintiff Liberi's computer. **NO** one else had possession of this photo, and that is why Defendant Taitz and Defendant Neil Sankey only have a black and white print-out copy. The only way Defendant Taitz and Sankey could have come into possession of this photo is if they in fact illegally entered Plaintiff Liberi's computer and illegally downloaded it. Suspicions of Defendants Taitz and Sankey illegally entering Plaintiff Liberi and Plaintiff Ostella's computer have already been turned over to the FBI and local enforcement on previous occasions. This picture in question is now all over the Internet,<sup>1</sup> for **no** legitimate purpose.
- Defendant Taitz attempted to hire Ruben Nieto, a convicted felon with convictions of Aggravated Assault as well as other crimes for **no** apparent legitimate purpose" or "for obvious violence against the Plaintiffs herein. Ruben Nieto on two [2] separate occasions attempted to get paid \$25,000.00 from Orly

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<sup>1</sup><http://pub44.bravenet.com/forum/static/show.php?usernum=3764075825&frmid=6712&msgid=1132698&cmd=show> [Defendant Edgar Hale's website]

Taitz through PayPal, on May 25, 2009, *see* **EXHIBIT “1”** and May 29, 2009, *see* **EXHIBIT “2”**.

- It is important for this Court to note the requests for payment by Ruben Nieto, were done with three [3] consecutive requests sent simultaneously, two [2] in the amount of \$8,000; one [1] in the amount of \$9,000 totaling \$25,000.00, to keep the amounts under \$10,000.00 which are automatically reported to the Federal Government pursuant to the Patriot Act.
- Due to the facts that Defendant Taitz's behaviors have now escalated to an extremely dangerous level against the Plaintiff, their husbands and children, e.g. Felony Stalking across state lines and what appears to be Defendant Taitz's attempt to hire an individual with a violent background to physically harm Lisa Liberi; her son and husband; as well as Lisa Ostella and her children, it is imperative that this Court refer this matter to the United States Attorney's Office or the United States Department of Justice immediately, before one of the Plaintiffs' are physically hurt and/or killed.
- Plaintiff Liberi is **not** a resident or citizen of the State of California as Defendant Orly Taitz falsely claims, nor is Plaintiff Liberi a resident or citizen of the State of Texas.
- Defendants Orly Taitz and Neil Sankey only want verification of Plaintiff Liberi's actual residency in order to carry out their violent, serious threats to destroy and get rid of Plaintiff Liberi. The entire docketing system of this case gets published all over the Internet by Defendant Taitz.
- Defendant Taitz is **not** a licensed attorney in the Commonwealth of Pennsylvania; this Court has never granted her *Pro Hac Vice* to represent Defendants Belcher and/or Sankey and therefore cannot litigate on their behalf.
- Plaintiff Liberi does **not** fundraise; nor does Plaintiff Liberi have anything to do with credit cards. The Undersigned handles his own fundraising.
- The August 7, 2009 Transcript has nothing to do with Defendant Taitz's Appeal. Defendant Taitz has **not** Appealed anything pertaining to the Hearing of August 7, 2009 or any Order derived from said Hearing. Again, Defendant Taitz is doing nothing more than attempting to mislead this Court.

On July 28, 2010 Defendant Orly Taitz filed her Response to Plaintiffs' Motion for Clarification or in the Alternative, Motion for Reconsideration of this Court's July 13, 2010 Order; Request to Deny Defendant Taitz Access to the August 7, 2009 Transcript;

and to Maintain the August 7, 2009 Transcript “Under Seal”; of course the undersigned was **not** served with this filing.

Plaintiffs’ hereby incorporate by reference as if fully plead herein, their Motion of July 26, 2010; Requesting Clarification and/or Reconsideration of this Court’s July 13, 2010 Order; Request to Deny Defendant Taitz’s Request to Purchase the August 7, 2009 Transcript; and to Maintain the August 7, 2009 Transcript “Under Seal”.

Plaintiffs’ are unaware exactly what Orly Taitz is asking for with her ramblings regarding Federal Rules of Civil Procedure, Rule 60(b). If she is stating it pertains to Plaintiffs’ Motion, it fails because Plaintiffs’ Requested Clarification or Reconsideration is pursuant to F.R.C.P. 59. If Defendant Taitz is asking this Court to act on something pursuant to F.R.C.P. 60(b) it fails, as this particular rule pertains to Relief from Judgment. And in the same sentence, Defendant Taitz refers to her motion as a Motion for Reconsideration. What Defendant Taitz does **not** seem to understand and to quote Judge Land, “*Like Alice in Wonderland, just saying it is so, doesn’t make it so*”<sup>2</sup>. [Emphasis added].

Moreover, Defendant Taitz is Requesting Reconsideration Pursuant to F.R.C.P. 60(b), which fails on its face. For what specific Order is Defendant Taitz asking this Court to Reconsider? A Motion for Reconsideration must be filed within ten [10] days of the docketing of the Order which Reconsideration is sought, *Broadcast Music, Inc. v. La Trattoria E., Inc.*, No. CIV.A. 95-1784, 1995 WL 552881, at \*1 (E.D. Pa. Sept. 15, 1995). Defendant Taitz has **not** cited any new law; any error; or any type of fraud. Moreover, all these issues have been previously adjudicated by this Court, as Defendant Taitz has made these same claims on June 14, 2010, Docket Entry No. 121; June 28,

2010, Docket Entry No. 127; and in her Notice of Appeal, although improper. This Court has fully addressed these issues. The Court found it had subject matter jurisdiction and personal jurisdiction over all Defendants; that Liberi did **not** reside in CA or TX, which at that time, none of the Defendants claimed; and this Court denied Defendant Taitz previous filings and in fact, on July 13, 2010 found these very ramblings of Defendant Taitz's to be **frivolous**.

A Court may grant a *Rule 59(e)* motion only when it finds an "intervening change of controlling law, the availability of new evidence, or the need to correct a clear error or to prevent manifest injustice." *Choi v. Kim*, 258 Fed. App'x 413, 416 (3d Cir. 2007) (citing *North River Ins. Co. v. CIGNA Reinsurance Co.*, 52 F.3d 1194, 1218 (3d Cir. 1995)). The party seeking reconsideration bears the burden of establishing one of these grounds. *In re Loewen Group Inc. Sec. Litig.*, 2006 WL 27286, at \*1 (E.D.Pa. Jan. 5, 2006) ("In a motion for reconsideration, the burden is on the movant.") (internal quotation omitted).

Defendant Taitz is accusing this Court's employees of "exacerbating" fraud or suggests that they were complicit in perpetrating fraud upon this very Court. [Defendant Taitz's Response, Docket Entry No. 136, pg. 19, ¶1] Moreover, all through out Defendant Taitz's filing, she continued **mis-stating** events that took place, the basis for the suit herein; and claiming Plaintiffs' herein, including the undersigned made statements, affidavits and declarations to statements that were **NEVER** made.

Defendant Taitz all through her frivolous filing claims Plaintiff Liberi has **not** proven where she resides. To the contrary, during the August 17, 2009 Hearing, Plaintiff Liberi had her driver's license; safe at home cards; birth certificate; marriage license; and

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<sup>2</sup> *Rhodes v. MacDonald*, 670 F. Supp. 2d 1363 (M.D. Ga. 2009)

Social Security card with her in Court, which she offered to the Court for review. Again, Defendant Taitz only wants confirmation of Plaintiff Liberi's home address to further her harassment, as proven by her filing and to carry out her threat to get rid of Plaintiff Liberi.

Contrary to Defendant Taitz's ramblings, all issues regarding diversity citizenship were addressed by the Plaintiffs' in their Response to this Court's Rules to Show Cause. Based on Plaintiffs' arguments, which Defendant Taitz failed to properly address, this Court found it had jurisdiction over all the Defendants and that the due process requirement had been met. Defendant Taitz is now wishing to reargue issues that were before this Court almost a year ago, which is obviously untimely and a complete waste of judicial resources.

Defendant Taitz has thrown so many false allegations against the Plaintiffs' in the within action; parties that work for the U.S. Supreme Court; Judge Carter's poor clerk; Judge Land and his staff; posting threats on her website under the heading "**Update on D.C.**" posted by Minuteman on March 9, 2010 against Judge Lamberth's grandchildren stating, *"Even Patriots, Constitutionalists, and Marines are open to persuasion concerning their own enlightened self-interest. A few close-up pictures of the honorable judge's grandchildren at the playground, a few pictures of decapitated and disemboweled victims with "MS-13" carved into their flesh, all slathered with HIV-tainted blood and stuffed into the judge's mailbox... yeah, that should do it."*<sup>3</sup> [emphasis added] And of course, the false accusations against Your Honor of this very Court. Defendant Taitz still does **not** understand just because she says it is so, it does **not** make

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<sup>3</sup> <http://www.orlytaitzesq.com/?p=8694>

it so, that the Court's require substantiated proof, not hearsay documents; hearsay statements; speculation and plain statements that change day to day.

In Defendant Taitz's ramblings, she inserts many unauthenticated and hearsay documents and statements. In particular, Defendant Taitz's attaches a "supposed" declaration of Plaintiff Liberi. Defendant Taitz previously filed two (2) copies of this document, which by themselves do not match each other, one with this very Court on June 28, 2010, appearing as Docket Entry No. 127. In the July 28, 2010 filing by Defendant Taitz, appearing as Docket Entry No. 136 also attached the same "supposed" declaration of Plaintiff Lisa Liberi. If this Court were to take all three [3] of these "supposed" declarations, which are unauthenticated hearsay documents, and match them to each other, the Court will clearly see they do **not** match each other.

All attachments filed with Defendant Taitz's filing of June 28, 2010, Docket Entry No. 137 are all unauthenticated; hearsay documents; and speculation, including Neil Sankey's "affidavit".

As stated above in the bullet points, it appears Defendants Taitz and Sankey obtained the photograph filed on July 28, 2010 by illegal means. Plaintiff Liberi has **never** provided a picture of herself or spouse to any of the Defendants or to any third parties.

Philip J. Berg, Esquire nor Plaintiff Liberi have **never** stated they paid the transcript fees for the August 7, 2009 transcript. Nor did either of them state that financial arrangements had been made. This is very verifiable with what is on file in the Third Circuit Court of Appeals. The August 7, 2009 Transcript speaks for itself, and clearly once this Court receives the transcripts which have been ordered for Chambers

and has the chance to review it, this Court will clearly find that this very Court Ordered the Hearing “Sealed”. Once a Hearing is “Sealed”, it Seals the Transcript of the proceedings, which is exactly what happened in this case.

Defendant Taitz has thrown many false allegations against Your Honor; this Court and the Court’s employees. It is important for this Court to note, Orly Taitz orchestrated the letter from Linda Belcher. In fact, Defendant Taitz and/or her employee Pamela Barnett on behalf of Defendant Taitz prepared the letter for Linda Belcher to sign. When you prepare a document, there are properties to the specific document, the properties is like a “finger-print” as it shows who the software is registered to; the version of the software; and the date the software was manufactured, created or updated. A copy of the screen shots showing Defendant Belcher’s letter posted on Defendant Taitz’s website; and the properties of Linda Belcher’s letter are attached hereto as **EXHIBIT “3”**. Defendant Taitz then posted her filings which were made with this Court July 28, 2010, appearing as Docket Entry No. 136 on her website July 30, 2010, a copy of the screen shots showing Defendant Taitz’s filings with this Court posted on her (Defendant Taitz’s) website; and the properties of Defendant Taitz documents are attached hereto as **EXHIBIT “4”**. As you can clearly see, the properties of Defendant Belcher’s letter and Defendant Taitz’s filings match identically, except for the creation date.

Defendant Taitz was accusing Your Honor of being prejudicial for not utilizing Defendant Belcher’s letter, the truth of the matter as demonstrated by **Exhibit “3” and Exhibit “4”**, the false statements in Defendant Belcher’s letter were all thought of, orchestrated and prepared by Defendant Orly Taitz.



In response to Linda Belcher's hearsay Letter, which we have reason to believe Orly Taitz orchestrated, the undersigned has **not** told Linda Belcher that his computer was infected; nor has Defendant Belcher refused to accept service by email; nor have any of Defendant Belcher's emails been returned from her second email address listed in the Certificate of Service. Defendant Belcher has been served with everything filed by Plaintiffs'. Ironically, Linda Belcher claims she did **not** receive Orders, and that of course was Plaintiffs Liberi and Berg's fault. What Defendant Belcher fails to understand is the Court mails the Orders directly to her, which she has refused to accept and had returned to the Court as documented on the Court's docket. Defendant Belcher did block the undersigned's emails on her newwomensparty email address prior to Plaintiffs' filing suit; however, she has the secondary email address.

Moreover, Defendant Neil Sankey went on Defendant Edgar Hales radio program, Plains Radio on May 28, 2009, which was previously filed with this Court. During this Radio interview, Neil Sankey stated, he obtained a copy of Plaintiff Liberi's driver's license from a bankruptcy Court. *See* page seven [7] of **EXHIBIT "5", which proves Neil Sankey did not obtain Plaintiff Liberi's photograph from anyone he claims to have interviewed in May 2009.** Also during this interview, Defendant Sankey stated they were making this suit go away, he did **not** know how much money it would cost, but it was going to go away, because if it did not, it would cost them a lot of money. Again, a disc of this radio program was provided to this Court during the August 7, 2009 Hearing.

Defendant Taitz states in her ramblings that Plaintiff Liberi "committed fraud upon this Court by soliciting a fraudulent complaint against Attorney Taitz to be made by

Larry Sinclair and his fraudulent complaint was later used by Attorney Berg and Liberi to prejudice Judges; Judge Carter and Judge Robreno against Taitz”. [Defendant Taitz Response, Docket Entry No. 136, pg. 15, ¶4]. Defendant Taitz then states that Defendant Linda Sue Belcher was on a 3-way call with Plaintiff Liberi and Larry Sinclair and that Plaintiff Liberi told Larry Sinclair to file complaints against Defendant Taitz. Defendant Taitz goes further stating that Larry Sinclair did in fact follow through and filed a complaint in Barnett, et al v. Obama, et al, U.S. District Court, Central District of CA, Southern Division, Case No. 09-cv-00082. **These statements are complete lies.** Larry Sinclair on his own filed a complaint against Defendant Taitz with Judge Carter on September 15, 2009 claiming Defendant Taitz asked him (Larry Sinclair) to give false testimony before Judge Carter. Larry Sinclair himself posted his Affidavit, all over the Internet. Plaintiff Liberi had **no** knowledge that Larry Sinclair had even been to California and/or met Defendant Taitz until she (Plaintiff Liberi) received a phone call from Mr. Sinclair in or about the end of September 2009. Mr. Sinclair informed Plaintiff Liberi, as outlined in his Affidavit on file with this Court, appearing as Docket Entry No. 112 that Defendant Taitz had accused Plaintiff Liberi of murdering her sister, that the police knew it, but were unable to prove it; and of tampering with her (Defendant Taitz) and her husband, Yosef Taitz’s, car stating that Plaintiff Liberi had friends in California that could have done it for her. *See* Docket Entry 112 filed with this Court September 30, 2009 (A copy of Larry Sinclair’s Affidavit to Judge Carter is attached to this filing as Exhibit “A”). Plaintiff Liberi has not spoken, as outlined in Plaintiffs’ Complaint, with Linda Sue Belcher since in or about the end of February 2009, prior to the filing of this law suit.

It should also be noted, Lucas Smith also filed a sworn Affidavit with Judge Carter towards the end of September 2009 also claiming Defendant Taitz sought falsified testimony from Mr. Smith as well. Moreover, the State Bar of California due to Judge Lands Sanctions is investigating Defendant Taitz. Defendant Taitz, by her own admission, has stated she is at risk of losing her license due to the sanctions issued upon her.

Defendant Taitz also continues stating Plaintiff Liberi is a forger. What Defendant Taitz fails to state to this Court, she hired a convicted document forgery, Lucas Smith, who was convicted several times for forgery of identification documents, then Defendant Taitz filed a forged Kenyan Birth Certificate, claiming it to be President Obama's Birth Certificate that she obtained from Lucas Smith in the case of Barnett, et al v. Taitz, et al, Case No. 09-cv-00082 before Judge Carter. Moreover, Defendant Taitz also hired a second person, Charles Edward Lincoln, III, who also had been convicted in Federal Court of using a false Social Security number; allegations of forgery of a Federal Court receipt, proof of this was previously filed with this Court and who has been disbarred in three (3) states. In fact, on June 25, 2009, Defendant Taitz introduced Charles Edward Lincoln, III to this Court as her Law Clerk or Legal Assistant.

Defendant Taitz next states, *"Party that was seeking to seal the transcript were the Plaintiffs, as during the hearing on August 7, defendant Hale, Internet Radio talk show host brought to court records of his radio shows, where he demonstrated that Berg and the rest of the plaintiffs repeatedly defrauded the court by taking out bits and pices of his radio programs, putting those together and claiming defamation"* [Defendant Taitz Response, Docket Entry No. 136, page 21, ¶1]. First, the statement is pure hearsay.

Second, this is another blatant lie by Defendant Orly Taitz. The undersigned gave his opening argument and requested the proceedings to be sealed. This Court may recall on August 7, 2009, Plaintiffs had witnesses testify, neither Plaintiffs nor the undersigned ever played any audio, although the full-length radio programs were provided to the Court on discs as well with transcriptions. It was Defendant Edgar Hale who played parts of clips, he did this for quite some time, it was Defendant Hale who failed to play the entire radio show and in fact the Court may recall, Defendant Edgar Hale even played part of an audio that substantiated Plaintiffs' Claims.

Defendant Taitz's next states, "*Berg and rest of the plaintiffs used the District Court and the Court of Appeals as the dumping ground, where they dumped hundreds and thousands of pages of unrelated, inflammatory and defamatory material, among them forged documents, perjured and fraudulent statements, all in an effort to prejudice both courts against the Defendants.*" [Defendant Taitz Response, Docket Entry No. 136, page 21, ¶1]. The only items filed were sworn Affidavits provided by parties who witnessed and had personal knowledge of the events, Defendant Taitz's Court filings and any Orders thereto, which are available on Pacer; and actual postings taken directly from Defendant Taitz and Defendant Hale's websites.

This Court may also recall in Defendant Taitz's filings with this Court; the filings and/or letters from Neil Sankey; and the "supposed" letter of Linda Belcher all claim Plaintiff Liberi resides in New Mexico. Taitz in previous filings also stated Plaintiff Liberi was a resident/citizen of New Mexico and that California was the proper jurisdiction of this case. It was **not** until this Court issued its Order severing and transferring the within action, Defendant Taitz has now changed her story claiming

Plaintiff Liberi is a resident /citizen of California, which is untrue. As stated in previous filings, Defendant Taitz changes her tall tales depending on who she is telling it to and what she is attempting to accomplish.

Neither Plaintiff Liberi, the Undersigned nor any of the Plaintiffs have ever pulled a fraud upon this Court or any other Court. This of course is simple projection by Defendant Taitz, she has a history of accusing her victims of the very things she is doing.

Defendant Taitz's filing of July 28, 2010 is **frivolous**; fails to cite proper law for this Court's jurisdiction, she has failed to cite one [1] Pennsylvania and/or Third Circuit Case, instead she cites every other jurisdiction for her position, which this Court is **not** bound to; her filing contains false hearsay statements; speculation; and she cites things that have absolutely nothing to do with the case herein; Defendant Taitz mis-states the basis of the lawsuit herein; and Defendant Taitz's only filed this frivolous pleading for improper purposes, including but not limited to wasting judicial resources; falsifying information and spreading it all over the Internet; to cost Plaintiffs' additional Attorney Fees; and to delay the proceedings, which are sanctionable actions and therefore, she must be Sanctioned.

This Court has the inherent power to issue Sanctions and Attorney Fees against Defendant Taitz, especially when false statements are filed with the Court and the pleading is filed for improper purposes. *See* Federal Rules of Civil Procedure, Rule 11. Sanctions are used to deter false statements; improper filings and unbecoming behaviors of an Attorney. *See Walsh v. Schering-Plough Corp.*, 758 F.2d 889, 895 (3d Cir. 1985) The Court Held (*"Undoubtedly, it was just such considerations that gave rise to the recent amendment to Fed.R.Civ.P. 11. That Rule, promulgated to keep attorneys "honest"*

*in their pleading practice, now authorizes sanctions to be imposed when an attorney violates his certificate that good grounds support his pleading and that the pleading is not interposed for delay).*

Federal Rules of Civil Procedure, Rule 11 states in pertinent part:

*"...it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law, and that that it is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation...If a pleading, motion, or other paper is signed in violation of this rule, the court, upon motion or upon its own initiative, shall impose upon the person who signed it, a represented party, or both, an appropriate sanction, which may include an order to pay to the other party or parties the amount of the reasonable expenses incurred because of the filing of the pleading, motion, or other paper, including a reasonable attorney's fee."*

The Court in Walsh v. Schering-Plough Corp., 758 F.2d at 896-897 went on further stating:

*"If we take no steps to resolve the issue which these affidavits have now presented to us, we run the risk not only of losing the respect of the bar, but of damaging the professional standards that lawyers look to us to uphold. Every member of the bar has had his character and fitness tested and reviewed before obtaining a license to practice. We, together, with other courts, are charged with maintaining at least that level of honesty and professionalism in the conduct of those who, once having obtained the right to practice, continue to exercise that right before us."*

*"...So too, as each instance of charged professional misconduct is ignored by us or deemed unworthy of our attention, our professional tapestry will imperceptibly, but surely, lose its form, its structure and its shape."*

*"Thus, in my opinion it is no answer to characterize the issue before us as one not worth our consideration. If we do not require strict adherence to principles which mandate candor and truthfulness, and if we refuse to decide and enforce claimed violations of those fundamental precepts, we will have only ourselves to blame if intolerable and proscribed practices of the bar become the rule rather than the exception."*

Defendant Taitz has a known history for inciting violence and harm against those who do **not** agree with her. See Rhodes v. MacDonald, 670 F. Supp. 2d 1363 (M.D. Ga. 2009) aff'd in Rhodes v. MacDonald, 2010 U.S. App. LEXIS 5340 (11th Cir. Ga. Mar. 15, 2010). Until this Court takes action against Defendant Taitz, her barrage of false frivolous filings and her illegal and dangerous behaviors will **not** stop.

This Court must refer this matter to the U.S. Attorney's Office and/or U.S. Department of Justice for immediate investigation into the illegal behaviors of Defendants Orly Taitz and Neil Sankey, including but not limited to: Felony Stalking, across state lines; Felony Harassment across state lines; Threat to destroy and get rid of Plaintiff Liberi, across state lines; Threat to professionally kidnap Plaintiff Ostella's children, across state lines; attempt to hire an individual to do bodily harm upon Plaintiffs, across state lines; illegal access into Plaintiffs Liberi and Ostella's computer systems, across state lines; and the other illegal activities of these Defendants. Defendants Orly Taitz and Neil Sankey must be stopped before, Plaintiffs Liberi; Ostella; their husbands; and children are physically harmed and/or killed.

Plaintiffs respectfully Request this Court to:

1. Grant their Motion to Deny Defendant Orly Taitz's request for the August 7, 2009 Transcript.
2. Maintain the August 7, 2009 Transcript "Under Seal".
3. Deny all Defendant Orly Taitz's Frivolous Filings and Requests.

Plaintiffs also ask this Court to:

1. Sanction Defendant Taitz.

2. Order Defendant Taitz to pay Attorney Fees for Plaintiffs' in the amount of Fifteen Thousand [\$15,000.00] Dollars.
3. To file Plaintiffs' Motion to hold Defendant Taitz in criminal and/or civil contempt.
4. For damages to be paid to Plaintiff Liberi and Ostella, including moving costs; and for Sanctions and Attorney Fees.

**CONCLUSION:**

For the reasons stated herein, Plaintiffs respectfully Request this Court to forward this information to the U.S. Attorney's Office and/or U.S. Department of Justice for immediate criminal investigation; Deny Defendant Taitz access to the August 7, 2009 Transcript; Maintain the August 7, 2009 Transcript "Under Seal"; Grant Plaintiffs' Request for Sanctions and Attorney Fees; Grant Plaintiffs' Request to have their Motion to hold Defendant Orly Taitz in Criminal and/or Civil Contempt Filed; for Damages to be awarded to Plaintiffs; and for Attorney Fees; and Deny all of Defendant Orly Taitz's Frivolous Requests.

Respectfully submitted,

Dated: July 30, 2010

s/ Philip J. Berg

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Philip J. Berg, Esquire  
*Attorney for Plaintiffs'*



## **EXHIBIT “1”**

From: Lisa Ostella <lisaostella@hotmail.com>  
Date: Mon, May 25, 2009 at 12:49 PM  
Subject: FW: PayPal money request from ruben nieto  
To: Lisa Liberi <lisaliberi@gmail.com>

Lisa Ostella  
Defend Our Freedoms  
<http://defendourfreedoms.org>  
Peace through Strength  
<http://www.barofintegrity.com>

> Date: Mon, 25 May 2009 01:19:34 -0700  
> Subject: PayPal money request from ruben nieto

> To: LisaOstella@hotmail.com  
> From: rubennieto69@gmail.com

>  
> Dear LisaOstella@hotmail.com,  
>  
> ruben nieto (rubennieto69@gmail.com) would like to be paid through PayPal.

>  
>  
> -----  
> Money Request Details

> -----  
>  
>  
>  
> Amount: \$9,000.00 USD

> -----  
> PayPal makes it easy to send money by email to ruben nieto  
> (rubennieto69@gmail.com) from your PayPal account.

>  
> To view the details of this Money Request or to pay ruben nieto with PayPal, just click  
> on the following link or copy and paste it into your web browser:

>  
>  
> [https://www.paypal.com/us/cmd=\\_prq&id=gMBnYb6Zkh4TMzHdhr6Ojrma4H5qDca9YKb0cA](https://www.paypal.com/us/cmd=_prq&id=gMBnYb6Zkh4TMzHdhr6Ojrma4H5qDca9YKb0cA)

>  
> Sincerely,  
> PayPal

> -----

> PROTECT YOUR PASSWORD

>

> NEVER give your password to anyone, including PayPal employees. Protect yourself against fraudulent websites by opening a new web browser (e.g. Internet Explorer or Netscape) and typing in the PayPal URL every time you log in to your account.

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➤ PayPal Email ID PP307

>

From: Lisa Ostella <lisaostella@hotmail.com>  
Date: Mon, May 25, 2009 at 12:50 PM  
Subject: FW: PayPal money request from ruben nieto  
To: Lisa Liberi <lisaliberi@gmail.com>

Lisa Ostella  
Defend Our Freedoms  
<http://defendourfreedoms.org>  
Peace through Strength  
<http://www.barofintegrity.com>

> Date: Mon, 25 May 2009 01:22:51 -0700

> Subject: PayPal money request from ruben nieto

> To: LisaOstella@hotmail.com

> From: rubennieto69@gmail.com

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> Dear LisaOstella@hotmail.com,

>

> ruben nieto (rubennieto69@gmail.com) would like to be paid through PayPal.

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> -----

> Money Request Details

> -----

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> Amount: \$8,000.00 USD

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> Event Date: May 25, 2009

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> -----

> PayPal makes it easy to send money by email to ruben nieto  
(rubennieto69@gmail.com) from your PayPal account.

>

> To view the details of this Money Request or to pay ruben nieto with PayPal, just click  
on the following link or copy and paste it into your web browser:

>

> [https://www.paypal.com/us/cmd=\\_prq&id=Hc2IdVPBYM-  
vlBQHe1YCKmHQEZgqSAx.Cz5XxA](https://www.paypal.com/us/cmd=_prq&id=Hc2IdVPBYM-vlBQHe1YCKmHQEZgqSAx.Cz5XxA)

>

> Sincerely,

> PayPal

> -----

> PROTECT YOUR PASSWORD

>

> NEVER give your password to anyone, including PayPal employees. Protect yourself against fraudulent websites by opening a new web browser (e.g. Internet Explorer or Netscape) and typing in the PayPal URL every time you log in to your account.

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> PayPal Email ID PP307

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Insert movie times and more without leaving Hotmail®. See how.

From: Lisa Ostella <lisaostella@hotmail.com>  
Date: Mon, May 25, 2009 at 12:52 PM  
Subject: FW: PayPal money request from ruben nieto  
To: Lisa Liberi <lisaliberi@gmail.com>

Lisa Ostella  
Defend Our Freedoms  
<http://defendourfreedoms.org>  
Peace through Strength  
<http://www.barofintegrity.com>

> Date: Mon, 25 May 2009 01:22:51 -0700  
> Subject: PayPal money request from ruben nieto  
> To: LisaOstella@hotmail.com  
> From: rubennieto69@gmail.com  
>  
> Dear LisaOstella@hotmail.com,  
>  
> ruben nieto (rubennieto69@gmail.com) would like to be paid through PayPal.  
>  
>  
> -----  
> Money Request Details  
> -----  
>  
>  
>  
> Amount: \$8,000.00 USD  
>  
> Event Date: May 25, 2009  
>  
>  
> -----  
> PayPal makes it easy to send money by email to ruben nieto  
> (rubennieto69@gmail.com) from your PayPal account.  
>  
> To view the details of this Money Request or to pay ruben nieto with PayPal, just click  
> on the following link or copy and paste it into your web browser:  
>  
>  
> [https://www.paypal.com/us/cmd=\\_prq&id=3QM7XIT2iniTwJp4NW8HKpvfDYdlj57uE](https://www.paypal.com/us/cmd=_prq&id=3QM7XIT2iniTwJp4NW8HKpvfDYdlj57uEGyP1w)  
> GyP1w  
>

> Sincerely,

> PayPal

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> NEVER give your password to anyone, including PayPal employees. Protect yourself against fraudulent websites by opening a new web browser (e.g. Internet Explorer or Netscape) and typing in the PayPal URL every time you log in to your account.

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> PayPal Email ID PP307

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## **EXHIBIT “2”**



From: Lisa Ostella <lisaostella@hotmail.com>  
Date: Fri, May 29, 2009 at 4:20 PM  
Subject: FW: PayPal money request from ruben nieto  
To: Lisa Liberi <lisaliberi@gmail.com>

Request for payment

Lisa Ostella  
Defend Our Freedoms  
<http://defendourfreedoms.org>  
Peace through Strength  
<http://www.barofintegrity.com>

> Date: Fri, 29 May 2009 12:05:37 -0700

> Subject: PayPal money request from ruben nieto

> To: LisaOstella@hotmail.com

> From: rubennieto69@gmail.com

>

> Dear LisaOstella@hotmail.com,

>

> ruben nieto (rubennieto69@gmail.com) would like to remind you to pay for the following Money Request through PayPal.

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> Money Request Details

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> Amount: \$8,000.00 USD

>

> Event Date: May 25, 2009

>

>

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>

> PayPal makes it easy to send money by email to ruben nieto

> (rubennieto69@gmail.com) from your PayPal account.

>

> To view the details of this Money Request or to pay ruben nieto with PayPal, simply click on the following link or copy and paste it into your web browser:

>

>

[https://www.paypal.com/us/cmd=\\_prq&id=3QM7XIT2iniTwJp4NW8HKpvfDYdlj57uEGyP1w](https://www.paypal.com/us/cmd=_prq&id=3QM7XIT2iniTwJp4NW8HKpvfDYdlj57uEGyP1w)

>

> Sincerely,

> PayPal

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> Security Advisory: When you log in to your PayPal account, be sure to open up a new web browser (e.g. Internet Explorer or Netscape) and type in the PayPal URL to make sure you are on the real PayPal website.

> For more information on protecting yourself from fraud, please review the Security Tips in our Security Center.

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> PayPal Email ID PP309

>

Insert movie times and more without leaving Hotmail®. See how.

From: Lisa Ostella <lisaostella@hotmail.com>  
Date: Fri, May 29, 2009 at 4:22 PM  
Subject: FW: PayPal money request from ruben nieto  
To: Lisa Liberi <lisaliberi@gmail.com>

Money request

Lisa Ostella  
Defend Our Freedoms  
<http://defendourfreedoms.org>  
Peace through Strength  
<http://www.barofintegrity.com>

> Date: Fri, 29 May 2009 12:05:37 -0700  
> Subject: PayPal money request from ruben nieto  
> To: LisaOstella@hotmail.com  
> From: rubennieto69@gmail.com  
>  
> Dear LisaOstella@hotmail.com,  
>  
> ruben nieto (rubennieto69@gmail.com) would like to remind you to pay for the  
following Money Request through PayPal.  
>  
>  
> -----  
> Money Request Details  
> -----  
>  
>  
>  
> Amount: \$8,000.00 USD  
>  
> Event Date: May 25, 2009  
>  
>  
> -----  
>  
> PayPal makes it easy to send money by email to ruben nieto  
> (rubennieto69@gmail.com) from your PayPal account.  
>  
> To view the details of this Money Request or to pay ruben nieto with PayPal, simply  
click on the following link or copy and paste it into your web browser:  
>

> [https://www.paypal.com/us/cmd=\\_prq&id=Hc2IdVPBYM-vlBQHe1YCKmHQEZgqSAx.Cz5XxA](https://www.paypal.com/us/cmd=_prq&id=Hc2IdVPBYM-vlBQHe1YCKmHQEZgqSAx.Cz5XxA)

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> Sincerely,

> PayPal

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> For more information on protecting yourself from fraud, please review the Security Tips in our Security Center.

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>

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> PayPal Email ID PP309

>

Hotmail® has a new way to see what's up with your friends. Check it out.

From: Lisa Ostella <lisaostella@hotmail.com>  
Date: Fri, May 29, 2009 at 4:23 PM  
Subject: FW: PayPal money request from ruben nieto  
To: Lisa Liberi <lisaliberi@gmail.com>

At least we know he hasn't been paid yet.

Lisa Ostella  
Defend Our Freedoms  
<http://defendourfreedoms.org>  
Peace through Strength  
<http://www.barofintegrity.com>

> Date: Fri, 29 May 2009 12:05:38 -0700

> Subject: PayPal money request from ruben nieto

> To: LisaOstella@hotmail.com

> From: rubennieto69@gmail.com

>

> Dear LisaOstella@hotmail.com,

>

> ruben nieto (rubennieto69@gmail.com) would like to remind you to pay for the following Money Request through PayPal.

>

>

> -----

> Money Request Details

> -----

>

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>

> Amount: \$9,000.00 USD

>

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> -----

>

> PayPal makes it easy to send money by email to ruben nieto

> (rubennieto69@gmail.com) from your PayPal account.

>

> To view the details of this Money Request or to pay ruben nieto with PayPal, simply click on the following link or copy and paste it into your web browser:

>

>

[https://www.paypal.com/us/cmd=\\_prq&id=gMBnYb6Zkh4TMzHdhr6Ojrma4H5qDca9YKb0cA](https://www.paypal.com/us/cmd=_prq&id=gMBnYb6Zkh4TMzHdhr6Ojrma4H5qDca9YKb0cA)

>

> Sincerely,

> PayPal

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## **EXHIBIT “3”**

- [Home](#)
- [Appeal of Carter Case](#)
- [From reader Carol](#)
- [Quo Warranto Filed and Served](#)

## Dr. Orly Taitz Esquire

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Your donations to the cause are much appreciated.



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The articles posted represent only the opinion of the writers, do not necessarily represent the opinion of Dr. Taitz, ESQ, and Dr. Taitz, ESQ has no means of checking the veracity of all the claims and allegations in the articles.

## Linda C. Belcher Filing pro se in U. S. District Court, Eastern District of Pennsylvania Case Number: 09-cv-01898 ECR

**Posted on** | July 1, 2010 | Comments Off



[Linda Belcher's Statement re Liberi's and Berg's Affidavits, etc.](#)

**Category:** [Uncategorized](#)

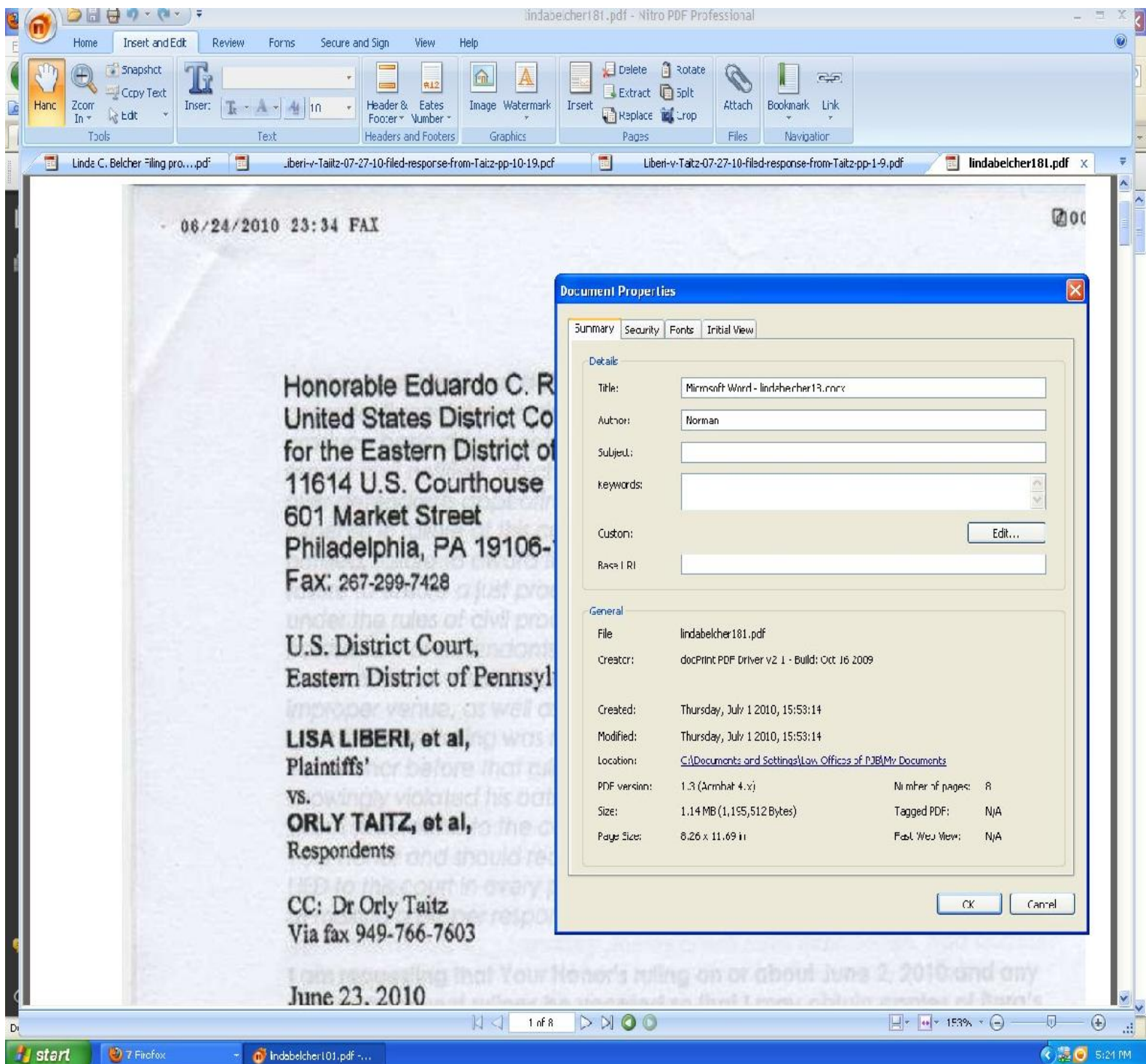
### Comments

Comments are closed.

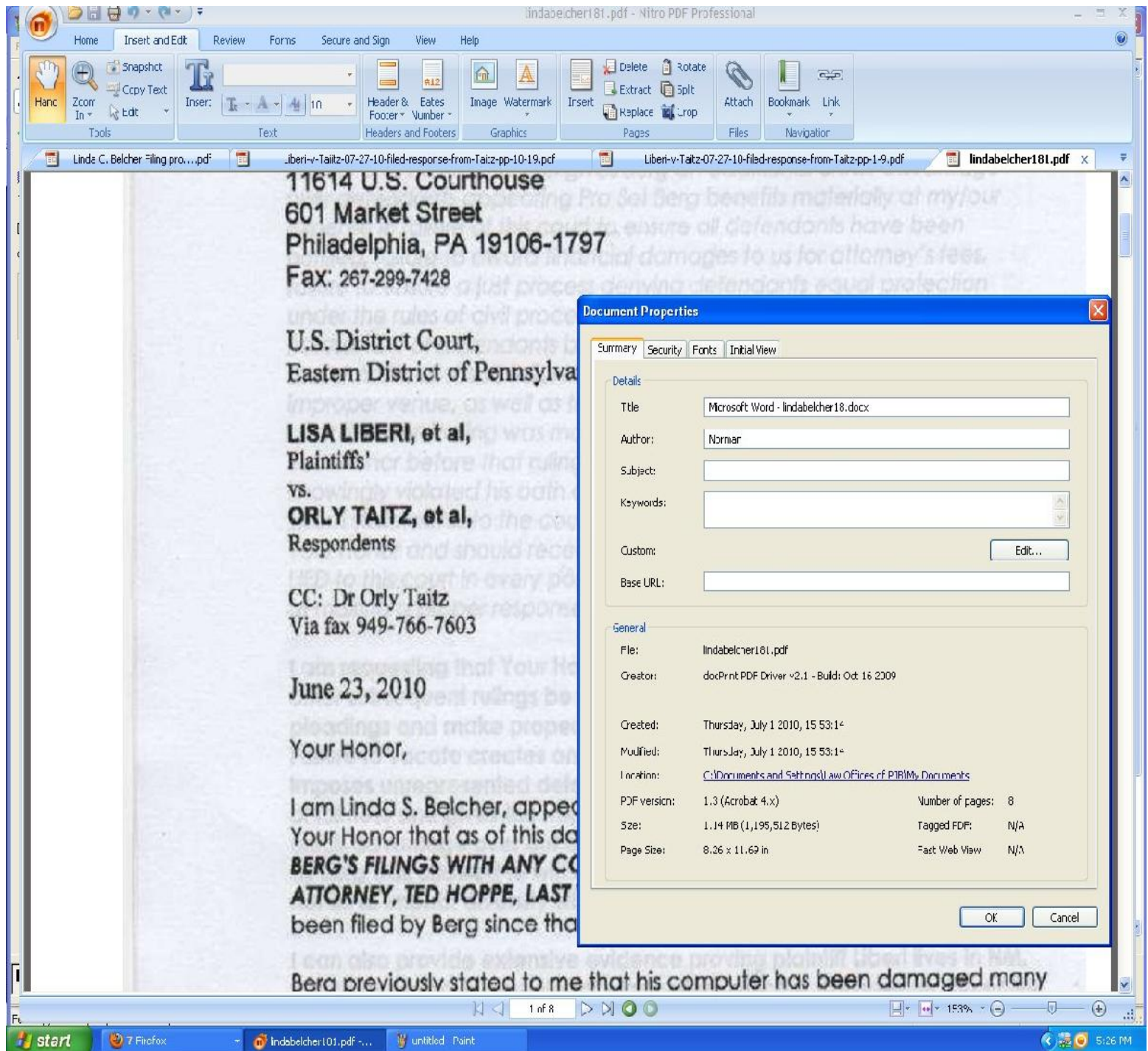


http://www.orytaitzesq.com/wp-content/uploads/2010/07/lindabelcher181.pdf and

http://www.orytaitzesq.com/?p=12091



http://www.orlytaitzesq.com/wp-content/uploads/2010/07/lindabelcher181.pdf and  
 http://www.orlytaitzesq.com/?p=12091



## **EXHIBIT “4”**

- [Home](#)
- [Appeal of Carter Case](#)
- [From reader Carol](#)
- [Quo Warranto Filed and Served](#)

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## Response to the 07-26-10 emergency motion by the plaintiffs, LISA LIBERI, et al, to keep transcripts under seal

**Posted on** | July 30, 2010 | [No Comments](#)



[Liberi-v-Taitz-07-27-10-filed-response-from-Taitz-pp-1-9.pdf](#)



[Liberi-v-Taitz-07-27-10-filed-response-from-Taitz-pp-10-19.pdf](#)



[Liberi-v-Taitz-07-27-10-filed-response-from-Taitz-pp-20-29.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-30-39.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-40-49.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-50-59.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-60-64.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-65-66.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-67-69.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-70-79.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-80-89.pdf](#)



[Liberi-v-Taiitz-07-27-10-filed-response-from-Taitz-pp-90-99.pdf](#)

**Category:** [Legal Actions](#), [Supporting Documentation](#), [Uncategorized](#)

## Comments

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Comments



09/17/2029 06:03

Case 2:09-cv-01898-ER Document 136 Filed 07/29/10 Page 1 of 51 #0493 P.001/080

ER

**Dr. Orly Taitz, Esq**  
**Attorney Pro Se & Attorney**  
**For Defend Our Freedoms Foundation**  
**29839 Santa Margarita Parkway, Suite 100**  
**Rancho Santa Margarita CA 92688**  
**Tel: (949) 683-5411; Fax (949) 766-7603**  
**E-Mail: dr\_taitz@yahoo.com**

09-cv

IN THE UNITED STATES

FOR THE EASTERN DISTRICT OF CALIFORNIA

**LISA LIBERI, et al.,** ) Response

) Motion for  
) for order  
) be assessed  
) claiming that Judge Robreno issued an

**Document Properties**

Summary Security Fonts Initial View

Details

Title: Liberi v Taitz 07-27-10 filed response from Taitz.pdf

Author: Norman

Subject:

Keywords:

Custom: Edit ..

Base URL:

General

File: Liberi-v-Taitz-07-27-10-filed-response-from-Taitz-pp-1-9.pdf

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Created: Today, July 30 2010, 14:43:38

Modified: Today, July 30 2010, 14:43:38

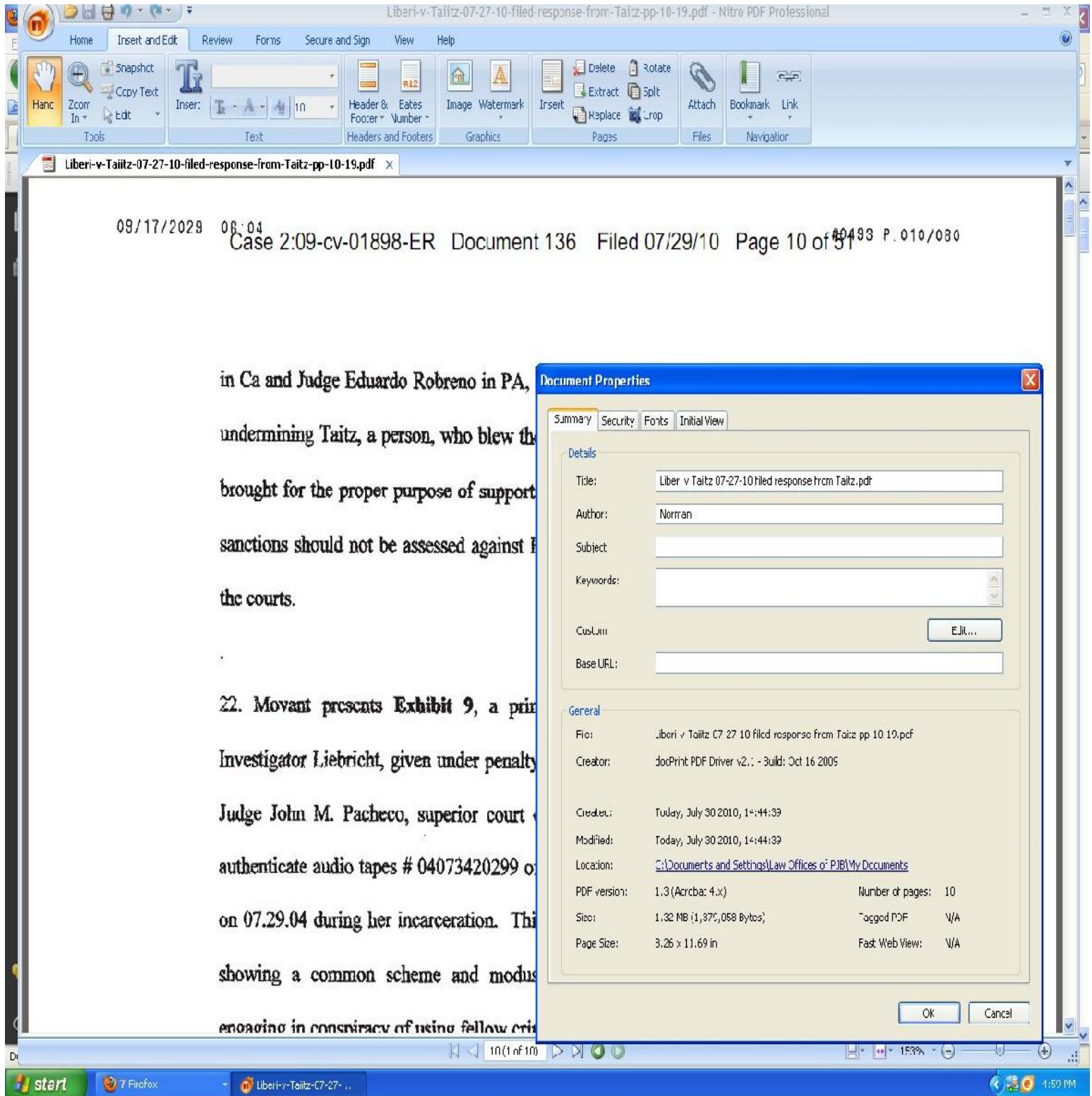
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PDF version: 1.3 (Acrobat 4.x) Number of pages: 9

Size: 1.16 MB (1,218,218 bytes) Tagged PDF: N/A

Page Size: 0.26 x 11.69 in Fast Web View: N/A

OK Cancel



## **EXHIBIT “5”**



**May 28, 2009.**  
**Plains Radio Network**  
**The Lions Den Show with Edgar Hale**  
**Neil Sankey interview with Edgar Hale**  
**33:08 minutes**

Ed Hale: Let me tell you somethin, Ed has a very special caller.

Caren Hale: Well I thought.

Ed Hale: Welcome Mr. Neil Sankey of Sankey Investigations. What's going on Mr. Neil?

Caren Hale: Hi Neil.

Neil Sankey: Hey. Not too much at the moment.

Ed Hale: Well, I tell you what, you want to share with the people the information that you told me today?

**00:25**

Neil Sankey: Yeah, I forwarded this out there. Um, Primary to Dr. Orly, but um. I am actually, this all started off way back, the exact date I'm not sure. I think it was earlier well, much earlier in the year certainly. When I got um, see Lisa Ostella and I use to do a lot of research together. Um all kinds of weird and off shoot stuff way back in the background on the depths of the origins of Mr. Obama and his crowd. She emailed me one night, back around the time when, if you remember Orly Taitz discovered that some of the files that disappeared on the Superior Court Index and they kept going away and coming back and then the scheduling would be missing all together for her. And um, they were moving them around and eventually getting, they were trying to lose the case is what they were doing. And it became apparent that we thought, or Lisa in fact came up with the idea, that Mr. Berg had to know this was going on. And there were circumstances which made this the probability I can't remember the details now but they would explode. I know Dr. Orly could explain it. Um, and she suggested to me, and she sent me an email, two emails in fact, suggesting that we investigate the background... oh she first told me that Lisa Liberi's real name was Richards. And she suggested that she had a criminal record and asked me if I can find that out. And then I got an email from her saying that we want to go ahead with it and would you please also look at the background of Berg and several other people at the same

time. So she in fact ordered all the work that we did and is now suing us for it.

Caren Hale: ::laughs:: How cute!

Neil Sankey: Yeah it is way cute. She didn't pay for it but she sure ordered it.

Caren Hale: That's interesting. Did you know this Ed?

Ed Hale: Yeah I found it out today when Neil told me. And uh, well Neil I'm going to tell you something. So far my friend, we have raised \$1,810 dollars in the last 2 hours.

**03:00**

Neil Sankey: Well that is very nice and very welcomed. Because **I know it's going to cost a bunch of money this thing if it doesn't go away. But I don't know how much more they need to make it go away. It's just a lot of...** [emphasis added]

Ed Hale: Well let me tell you something, you sent me a little bit of information you sent me them court records and stuff showing Lisa Liberi's criminal record but you know something Neil, you and I talked, it is the tip of the iceberg isn't it? Are you there? Did I lose you Neil?

Caren Hale: Must have.

Ed Hale: Oh my goodness he'll call back he is on a dang cell phone. Oh right Ken, Bird, Randy? What do you all think about that?

Male Caller: Everybody's getting sued.

Female Caller:::inaudible:: I missed part of it and I could barely hear Neil.

Ed Hale: Basically what he said was....

Caren Hale: That's probably him calling back.

**::dial tone::**

Ed Hale: Well I lost Randy.

Neil Sankey: I'm sorry you were saying.

Ed Hale: Ok go ahead Neil.

Neil Sankey: Yeah, what were you saying Ed?

Ed Hale: I said, the information you sent me on her criminal record and everything.

Neil Sankey: Um huh.

Ed Hale: And a little of this other information is just the tip of the iceberg of the information that you have. Right?

Neil Sankey: Oh yeah.

Ed Hale: I mean you got tons of stuff out there just waiting for the court date.

**04:22**

Neil Sankey: Well maybe I could also address a couple of questions here, and one is Mr. Berg has been asking and in that lawsuit you'll see he asks several times what business Sankey had sending this stuff all over the place. And he alleges that I don't have the right to do that. Well he is wrong on both counts. Because in the first place the business I had doing it is that it is my job and that it was ordered as we now know by one of his co defendants. But, in addition to that, I have every right. The law in California, which obviously he hasn't read, does give you several rights to use those security numbers and to investigate using them and to access certain information with them. Obviously we are well conscious of this our licenses and our life depends on them. We don't do silly things with them.

Ed Hale: Right.

Neil Sankey: And we don't use them very often. **But fraud is one of the exceptions. Judgement is one of the exceptions. Both of which we have in this case. We are looking at the possibility of a lot of people being defrauded out of a lot of money. We know they have been already by Liberi and there are a lot of people in the San Bernardino area still looking for her actively and have asked me to help them. I know where she is but I'm certainly not going to give that away until it suits me to do so. [emphasis added]**

Ed Hale: Well, I'll tell you what Neil, the thing about it and that's why I'm asking. Ok Caren I'll take care of that in a minute.

Caren Hale: Okay, Okay.

Ed Hale: I'm trying to talk to Neil here. Bird, Ken, you all got any questions for Neil?

Ken: No questions at this time sir.

Bird: No, I'm good.

Ken: I 'm just absorbing.

Ed Hale: Go ahead Bird.

Bird: I'm good. I just had a little hard time hearing what Neil was saying. But I'll catch up.

Caren Hale: Well, I just want to reiterate. What you are saying is that Lisa Ostella asked you to look into all of this.

Neil Sankey: Yeah.

Caren Hale: So you think it was a set up?

Bird: Lisa Ostella did?

**06:36**

Neil Sankey: She asked me to find out whether, she had heard from another source, that Lisa Liberi had a criminal record and that her real name was other than Lisa Liberi. And she asked me to look into it. And of course, as soon as you look at the records in San Bernardino and I would add that these are public records, they are open, Internet, anybody can, any one of you can go in there and look at these records page by page. It is all totally public, as is the bankruptcy court and you can see all of this stuff there. There it is. There is an index online, at the courthouse, or through the courthouse. Where you can index her by name, by case number whichever way you want to do it. And it will tell you everything I've given out. Everything is out there.

Caren Hale: And also part of the claim that she is saying is that she tried to do that herself and nothing was found.

Neil Sankey: Well, yes but let me tell you, you know, the, the....

Bird: If she had suspicions Neil, why is she a plaintiff?

Neil Sankey: I don't know the answer to that. She is not suppose to enter into any litigation without the express permission from her probation officer.

Bird: Exactly.

Neil Sankey: Umm, you know, that you would have to ask them.

Ed Hale: Well Neil, I'll tell you something. The other night, last Monday night, when I had the show, and I produced all those documents that you gave me.

There was something I went a little bit further than you did. On our declaration which I call #4.

Neil Sankey: Yes.

Ed Hale: She had her signature on it. Ok?

Neil Sankey: Um Huh.

Ed Hale: And she also, and these lawsuits that she filed against us, she had her signature there.

Neil Sankey: Absolutely.

Ed Hale: And I'll tell you what. Neil, the signatures were identical.

Neil Sankey: Of course. Of course. I wouldn't have stuck my neck out in the first place if I wasn't sure what I was doing.

Ed Hale: Well I'll tell you this much, why don't you just briefly tell the folks what you, you're the one that found all this information. Why don't you tell them what she was charged with, just kinda give them a brief synopsis of what went on and what she wound up gettin.

Neil Sankey: Yeah, I will. I can't be too specific with that stuff because we're not absolutely certain that it's all been properly dealt with yet.

Ed Hale: Ok.

**09:22**

Neil Sankey: But we do think for the most part there was two separate phases of this lot. Back in I suppose around the late 90s and the 2000, what she was doing originally was buying cars. I think she bought like 5 brand new cars in a very short space of time. She says she bought them for friends, I don't know what happened to them. But essentially she was amending her own credit report to make it look right. And obtaining credit by means of that. She was also reporting her own identity theft to the police so that a report was made of that. Then she would get a copy of that report and use that report to correct her credit.

Ed Hale: And Neil, did she not also forge some of these reports?

Neil Sankey: Oh yeah, well pretty much everything. If you hold her documents are lies then you have committed forgery. And she certainly did that. There were a number of these offenses. And then she got into other stuff such as what you would call credit fraud I suppose. The mortgage stuff seems to

have come a little bit later but she certainly had some jewelry and all kinds of other stuff. A lot of people invested money with her. Some of these micro loans, she got those, under the impression that it was good credit and it wasn't. All kinds of things.

Ed Hale: Yeah like one I remember specifically it was a community bank. She got \$35,000 on an unsecured loan.

**11:05**

Neil Sankey: Yeah, absolutely. And um, in that case she went to the trouble to get the credit report, get them all changed around, and altered so it all looks good for her and actually I think took the documents down to San Diego to get the loan. But she went to a lot of trouble she did a very good job, a very thorough job really. But it is not as complicated and fail proof as she might have thought. And then she went into selling and reselling the same house several times and getting mortgage credit fraud which obviously is bigger amounts.

Ed Hale: Well damn, I didn't know about that one.

Neil Sankey: Yeah, that was after 2000. That was when she was arrested in 2004 for that. That arrest was by the district attorney's special unit in San Bernardino they were just looking at these, what they regard to be as major crimes and they are high value stuff. And there were 4 offenses of that charged in 2004. So there was um I don't know over 100 certainly, I haven't really counted them. But...

Ed Hale: Well according to those court records you sent me there was 19 counts on her and she pleaded guilty to 9 of them.

Neil Sankey: Yeah, that is when it came down to eventually but when it started out I think you will find it is over 200.

Ed Hale: And I've been told that the money that she stole was somewhere between \$350,000 to \$400,000. Is that correct?

Neil Sankey: That is absolutely correct and that is probably a low ball figure.

Ed Hale: Oh my God.

**12:45**

Neil Sankey: A lot of people are still out. She hasn't paid up one penny as I understand it in restitution. Now what I said originally, and MommaE called me, she was a dear sweet little soul, trying to get information out of me before this suit was filed, and um, she made out that it was all going to go away and everything was going to be alright. She says in her summons and

complaint there that I had told her that I had not verified that the Lisa Liberi in Phil Berg's office was the same one as the lady in San Bernardino.

Ed Hale: You don't have to tell me I know she is lying through her teeth. But go ahead.

Neil Sankey: Well, I just want to tell, the simple fact is, what I said to her was, I personally cannot definitely say that Lisa Liberi in Philip Berg's office is the one in San Bernardino. What I can say is the one in San Bernardino is the one in New Mexico. And the one in New Mexico seems to have numerous contacts with Pennsylvania and Phil Berg's office, etc. And that's what I said to her. I didn't say I hadn't verified it. Because obviously I was very methodic in what I was doing. But there is no way even to this day, I haven't seen this woman I don't know what she looks like. Well I do know what she looks like but...

Ed Hale: Now I understand, and again, you don't have to answer these questions if you don't want to Neil.

Neil Sankey: But know I....

Ed Hale: Now I understand that **you have a picture of her on a driver's license** and you took it to San Bernardino and they would not let you see the picture but they compared it and said it was the same person. Is that correct? **[emphasis added]**

Neil Sankey: Umm..Yeah. Yeah, they basically. They...

Ed Hale: Let me ask you this question, was it a New Mexico state license that you had?

Neil Sankey: Uh no, it's not, **it is a California Driver's License. [emphasis added]**

Ed Hale: Let me ask you this so you can clear yourself, how did you obtain this?

**14:54**

Neil Sankey: Well, the California Driver's License and Social Security number is with a social security card on a piece of paper and that is known to photograph with her bankruptcy file in the Southern District, um, Central California Federal Court. So she's been bankrupt many times and those documents are in the file.

Ed Hale: Ok, we have a lady here that wants to ask you a question, Neil. Go ahead Elizabeth, ask your question.

Elizabeth: Um, actually I have two questions and Ed might have to answer the first one. I was looking at the Lisa Liberi signatures on your website and I can figure out where one of them is from but now where the other one is from.

Ed Hale: Ok, there is not two Lisa Liberi's. There is a Lisa Ostella and a Lisa Liberi. Can you tell us the difference between the two of them Neil?

Neil Sankey: Oh sure. Lisa Liberi is the lady I've been talking about she lived most of her life in Southern Texas and then California and now where she is in New Mexico. Um, Lisa Ostella is the lady that runs the company doing a webmaster job and she is very good at it and she is a nice lady. She lives in New Jersey and has nothing to do with Lisa Liberi.

Elizabeth: And I was wondering about the two Lisa Liberi signatures.

Ed Hale: Ok those two signatures, one of them was taken from a court document which Neil supplied me.

Elizabeth: Oh ok.

Ed Hale: And that court document was when she was convicted and everything. The other signature was taken from the lawsuit when we were served the other day.

Elizabeth: Oh ok.

Ed Hale: So you know she is claiming she didn't have this record and all of this good stuff, well unfortunately the two signatures match don't they Neil?

**16:58**

Neil Sankey: Oh absolutely and at one stage in one of those declarations somewhere she actually says how she had to change her signature because her identity was stolen.

Ed Hale: Well, damn, you ain't sent me that one yet. See that folks! This man is uttered with stuff!

Elizabeth: My understanding was that Lisa Liberi electronically signed this suit? But you must have gotten one with a real signature when you were served?

Ed Hale: Yes, when we were served, we got a certified copy, and in this certified copy it was a copy of her signature.

Elizabeth: Well that clears up a lot of stuff.

Ed Hale: Well, that's what we be trying, I tell you what, let me, let me find that cotton pickin page while Neil talks to you a second and I will post it in the chat room and everybody can go look at the two signatures.



Elizabeth: And Mr. Sankey, are you able to talk about your response to the suit or can you not talk about it?

Neil Sankey: Well we denied everything, obviously far as I'm concerned it was without any foundation.

Elizabeth: But you did file a response?

Neil Sankey: I did my job and provided information that is available to the general public. That's all.

Elizabeth: But you did file a response?

Ed Hale: Oh yes, let me explain something to you. Neil is with the same attorney that Plains Radio Network has. Neil is doing this P.I. work that's why we are asking Plains Radio to pick up his part of the attorney. And you all are just seeing a touch of, I mean Neil is telling me stuff I didn't even know tonight.

Elizabeth: ::laughs:: It's real complicated Ed. It's a complicated suit.

Ed Hale: It certainly is.

Caren Hale: It's way complicated.

Neil Sankey: It's like getting Mr. Obama's life history out there to the public. It's very, very difficult.

Ed Hale: I understand that.

Neil Sankey: But if they knew, my God, if they knew.

Ed Hale: Oh I know Neil, you told me, you said Ed, you sent me that email and said, and I thought what was funny, when you sent it to me and all that stuff you said some apologies are needed. And I looked through it and said Oh My God, and then I called you up and I said Neil I need to post this stuff, you said just make damn sure you don't have her birthday and social security number in there.

Neil Sankey: Yeah.

Ed Hale: And then Ed, when I tell you what, we printed them out and Miss Caren went through them with a fine tooth comb and that's why you all see some black marks on a few of those papers out there because we just...

Elizabeth: That was smart.

Ed Hale: Even though they are court documents, we went ahead and done that.

Caren Hale: Well, we don't want another lawsuit you know.

Elizabeth: Exactly.

**19:48**

Neil Sankey: **Well, there are ways to do that. But in fact, they opened themselves to this kinda thing when they commit fraud all putting themselves in a situation where they may be suspected of it. [emphasis added]**

Caren Hale: Right.

Ed Hale: Well what's funny Neil, in one of those declarations you sent me, Lisa Libera, Liberer, or how ever in the heck you say it, she was claiming Dr. Orly outed her with this social security number and everything. She admits there that in 2007 that her social security number, date of birth was all over the internet then. So you know this woman is a pathetic liar.

Neil Sankey: Yeah.

Ed Hale: Now let me ask you a question, Neil, is there anything you can to tell us about Mr. Berg?

Neil Sankey: Umm

Ed Hale: Or do you want to keep that quiet?

Neil Sankey: I'd rather not. I'd rather leave that alone for the moment.

Ed Hale: Ok, Ok. But you got plenty on him too haven't you my friend?

**20:45**

Neil Sankey: Well let me say this, I started this out with the best intention. I really felt that Mr. Berg would have liked to known the problems that he had. With the best of the intentions, I sent this information to him specifically saying be careful, this is what you're doing, this is what you got.

Ed Hale: I hear ya, alright, we got another caller. Elizabeth are you done?

Elizabeth: Can I ask one more quick question?

Ed Hale: Sure let me get this other caller. Caller you are on the air, who are you and where are you calling from? Hello caller, hello caller, I guess they hung up. Alright go ahead Elizabeth ask your next question.

Elizabeth: Now Mr. Sankey, has anyone been able to compare photographs? Of like the West Coast Lisa Liberi to see if there is an East Coast Lisa Liberi? Has there been any photographs?

Ed Hale: That's what we were talking about earlier. He has a photo of her driver's license,

Elizabeth: Oh, ok.

Ed Hale: He took it to the San Bernardino County Sheriff's Department. They would not let Neil see this picture. But they took the picture, looked at it and said, yup, same person.

Elizabeth: Ok, well this has cleared a lot up for me.

Ed Hale: Well, I tell you what, you know, I'm glad Neil come on here because, let me tell you something, Neil knows what he can talk about and what he can't.

Elizabeth: Exactly.

**22:07**

Ed Hale: The information he had supplied me was bits and pieces. And you know I was running with what I was running with. And I had enough information to destroy all 3 of them. Now Neil got one more question, you got anything on our gal in Oklahoma?

Neil Sankey: I'm sorry, Which one is that?

Ed Hale: You won't answer that huh?

Caren Hale: He said which one is that.

Ed Hale: We are talking about MommaE

Neil Sankey: No, well I, I, ...

Ed Hale: You don't need to answer that.

Neil Sankey: Nothing I need to know. But let me say I just thought she was blatantly dishonest. And it was a very pathetic attempt to try to snow someone and get them to commit themselves to a whole lot of trouble.

Ed Hale: And you know something Neil, she is the world's worse about 'poor little ole me' ain't she?

Neil Sankey: Oh.

Ed Hale: She can make people think hell is an ice house.

**23:01**

Neil Sankey: Well, likes to think she can, maybe. But you know. It was just unnecessary. I mean, it is just not a pleasant thing to do to anybody.

Ed Hale: Well her day is coming. Elizabeth, thank you for that call you got any more questions?

Elizabeth: Thank you. I think you answered them all and I appreciate everybody's time.

Ed Hale: Your more than welcome. Ok gang, if you all got any calls, you got a question you want to ask Neil, be more than welcome to call in here and ask him. Now you see why I want this man, I want you guys to help pay this man's way.

Bird: There is a question.

Ed Hale: Yeah, go ahead Bird.

Bird: In the chat room, Bob H. wanted to know, if he heard correctly that Neil is not for certain that Lisa Liberi and Lisa Ostella are two people. Or are they one in the same.

Neil Sankey: I'm as sure as I can be, yes.

Ed Hale: That they are two different people?

Neil Sankey: Yes.

Bird: Ok, thank you.

Ed Hale: Ken you got anything?

Ken: I've been listening to you guys and I've been reading the chat. So I have two hemispheres of my brain going at the same time. And there is a little bit of drama going on in the chat room with Linda Starr.

Ed Hale: Well I understand that Mr. Phil Berg is sitting over there on another network trashing the hell out of her.

Ken: Yeah

Ed Hale: But that's all right, Linda. Don't worry. Ed will trip over it. I'll get it. He'll pull the information off just like I do with MommaE and others and use it against him. That guy don't have very much between the ears I don't

think. I hear two dogs in there with Caren and they are just fighting up a storm.

Ken: Apparently Berg is on the McGrew show and he is really trashing Linda Starr hard right now.

Ed Hale: Well consider the source. Mark McGrew. This is a guy that took and I need to talk to you off the air about this. This is the guy took and played Ed's friend and got the name of the P.I. out in Hawaii and the phone number, gave it to MommaE and Lisa and they called this guy up and said Hey, we want you to send us a copy of that and charge \$500 bucks.

Caren Hale: And is that not the exact same thing that Neil just said that was done to him?

**25:28**

Ed Hale: Yeah, Neil, I'm going to email you tonight or tomorrow the name of this private investigator out there in Hawaii and I'd appreciate if you can run him up one side and down the other for me.

Neil Sankey: I'll see what I can do.

Ed Hale: What is the penalty for something like that? Taking on two clients for the same case?

Neil Sankey: Well obviously you have a major ethics problem you should lose your license at least.

Caren Hale: Well they have admitted that that's happened.

Ed Hale: Yeah, I've got a tape where this stupid Mark McGrew says well, MommaE it could have cost \$1,000 the first time but when he went back the second time the works was all done and it cost a lot less.

Neil Sankey: Well, it depends who owns the information really if he paid for it than it is his to disseminate as he wishes

Ed Hale: We paid him \$1,000 to get this information.

Neil Sankey: Then it belongs to you.

**26:26**

Ed Hale: It wasn't a freebie, like you have done a bunch of it. But I have the credit card receipts on PayPal. We paid this guy \$1,000 bucks. We paid him \$840, then we paid him another \$60 and then we paid him another \$100.

Neil Sankey: Wish you had my number then.

Ed Hale: Well, yeah.

Neil Sankey: ::laughs:: Just very unethical.

Ed Hale: And I'll you what, what he did, then 3 days later, he turned on us and went with you know who. And she probably spilled her guts to him just like she did to you and made me look like the biggest jack ass that ever walked. Then he got her the divorce documents to cover her butt. We know it and we can prove it. Well Neil, you have anything else you want to talk about?

Neil Sankey: No, not really. If everyone is satisfied, I'm always here, you can always call me.

Caren Hale: Well Neil we appreciate all your help, Neil.

Neil Sankey: I'm sorry?

Caren Hale: We appreciate all your help.

Neil Sankey: Oh it's a pleasure.

Ed Hale: I'll tell you what. what you have actually done, you have put a bunch of people sitting out there in that chat room in shock.

**27:39**

Caren Hale: Well there is a question, that I'll, let me scroll back up here and ask, and I know it's been asked. They want to know are you saying the Lisa in New Mexico, well Lisa Liberi and Lisa Ostella are or are not the same person?

Neil Sankey: Are not.

Caren Hale: Are Not.

Neil Sankey: They are two separate people.

Caren Hale: Ok that's good because the question keeps coming up.

Ed Hale: And Lisa O. use to be one your best friend didn't she?

Neil Sankey: Yeah, I got on real well with her she was very good at her job and I did not have a problem with her. It's a shame it really is. But uh...

Ed Hale: I'll tell you what, Ok here is a question that is being asked out there, and they said please ask Neil if the New Mexico Lisa and the Pennsylvania Lisa are the same person?

Caren Hale: What did I just ask him?

Ed Hale: No, you Lisa O is from New Jersey. They are claiming that Lisa Liberi lives in Pennsylvania and works for Berg. She does not, does she?

**28:47**

Neil Sankey: Let me clear that up. There is a Lisa Liberi that lives in Pennsylvania. She is a totally different person. She is older than our Lisa Liberi, and she has a different middle initial totally different.

Ed Hale: And she does not do any kind of legal work right?

Neil Sankey: You know, I don't know what she does but she lives in Pennsylvania. And Lisa Liberi lives in New Mexico as part of her probation insists that she does and checks in regularly with her probation officer.

Ed Hale: And once again if any of you guys got any questions that this is not the same Lisa Liberi that works for Phil Berg if that leak that I just put out there in the chat room, go over there and compare the signatures, they are identical. It's [www.plainsradio.com/L4.html](http://www.plainsradio.com/L4.html). And I guarantee you folks, they are one in the same. Because whenever you look at those signatures and you will see that they are the same. Now I have had some stuff tossed around and I don't know if you can answer this Neil, but I've been told that Lisa Liberi, that the reason why she did this, is that she is actually working for Obama in hopes of getting a pardon. Do you have anything on that?

Neil Sankey: I have nothing on that, no.

Ed Hale: Just another Internet rumor, but I'm just trying to clear it up, we want the truth.

Neil Sankey: Well we do want that.

Some woman: Oh I have a question, I would like to know, why if she was convicted in a court of law why is she on probation when she has this lengthy criminal record.

Ed Hale: I guess she soft soaked the judge don't you think Neil?

**30:49**

Neil Sankey: So would a lot of people, she got 10 years sentence, and then she had heart attacks, allegedly. And then was very ill, allegedly, and the sentence was reduced to 3 years probation. I can't comment on it, I don't know the truth.

Ed Hale: But you know something, if she screws up this probation, she goes to jail for 8 years, doesn't she?

Neil Sankey: Absolutely.

Ed Hale: And I'll tell you something, in one of the declarations out there, I know it's in the police report out there, when she was under arrest when ever the officer told her she was under arrest, she had already said she was, oh what do you call it when you are on insulin? Diabetic.

Neil Sankey: Diabetic.

Ed Hale: And she reached a can of coke or can of Dr. Pepper and started glumping it down and the officer had to take it away from her.

Neil Sankey: uh huh.

Ed Hale: And that's in the police report.

**31:52**

Neil Sankey: She's a very shrewd lady.

Ed Hale: I tell you what, you know the thing about it. You can't just keep lying. They catch up with you.

Caren Hale: She is braver than I'd ever be.

Ed Hale: You know the thing about it is, she thinks she is so brilliant that nobody is gonna catch her. She got caught once, she got caught a second time. And you know, Neil, I heard and I don't even know if you can even answer this, I heard that she has applied for another loan.

Neil Sankey: Um, I'd rather not get into that stuff because all kinds of things haven't been adjudicated let's put it that way, you know.

Ed Hale: ::coughs:: mike goes off

Caren Hale: Turn your mike off hang on there just a minute Neil.



Ed Hale: Neil you want to hang on for the next hour? Or do you want to drop off.

Neil Sankey: Well I can, what ever you like.

Ed Hale: Somebody might have a question.

Neil Sankey: Yeah I'll hang on a bit longer.

**33:08**

::goes to break::

Law Offices of:  
**Philip J. Berg, Esquire**  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
Identification No. 09867  
(610) 825-3134

*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	
ORLY TAITZ, et al,	:	
	:	Case No.: 09-cv-01898-ECR
Defendants.	:	
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**CERTIFICATE OF SERVICE**

I, Philip J. Berg, Esquire, hereby certify that a copy of Plaintiffs' Reply to Defendant Orly Taitz's Response to Plaintiffs' Motion to Maintain the August 7, 2009 Transcript Sealed was served this 30<sup>th</sup> day of July 2010 electronically upon the following:

Orly Taitz  
Defend our Freedoms Foundation, Inc. (unrepresented)  
26302 La Paz Ste 211  
Mission Viejo, CA 92691  
Email: [dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)

Neil Sankey  
Sankey Investigations, Inc.  
Post Office Box 8298 Mission Hills, CA 91346  
By USPS with Postage fully prepaid

The Sankey Firm, Inc. a/k/a The Sankey Firm (unrepresented)  
2470 Stearns Street #162 Simi Valley, CA 93063  
By USPS with Postage fully prepaid

Linda Sue Belcher  
201 Paris  
Castroville, Texas 78009  
Email: [Newwomensparty@aol.com](mailto:Newwomensparty@aol.com) and  
Email: [starrbuzz@sbcglobal.net](mailto:starrbuzz@sbcglobal.net)

Ed Hale  
Caren Hale  
Plains Radio  
KPRN  
Bar H Farms  
1401 Bowie Street  
Wellington, Texas 79095  
Email: [plains.radio@yahoo.com](mailto:plains.radio@yahoo.com); [barhfarms@gmail.com](mailto:barhfarms@gmail.com);  
[ed@barhfarnet](mailto:ed@barhfarnet); and [ed@plainsradio.com](mailto:ed@plainsradio.com)

s/ Philip J. Berg  
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PHILIP J. BERG, ESQUIRE